

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No. 1:22-cv-24023-SCOLA/GOODMAN

KENNETH C. GRIFFIN,)
)
Plaintiff,)
)
v.)
)
INTERNAL REVENUE SERVICE, *et al.*,)
)
Defendants.)
_____)

DECLARATION OF TIGTA SPECIAL AGENT IN CHARGE ERIK WOOD

I, Erik Wood, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am the Special Agent in Charge, Special Investigations Unit, for the Treasury Inspector General for Tax Administration (TIGTA). I work in the TIGTA Office of Investigations (OI). I have held this position since 2019.
2. TIGTA is an agency separate and apart from the Internal Revenue Service and operates wholly independent of the IRS. In accordance with § 3(a) of the Inspector General Act (IG Act), TIGTA reports to, and is under the general supervision of, the Secretary of the Treasury.
3. OI evaluates allegations to determine if unauthorized disclosure or inspection of return information has occurred. This authority was granted to TIGTA under Sections 8D(k)(1)(A) and 9 of the IG Act. Treasury Order 115-01 gives TIGTA the duty and responsibility to conduct investigations relating to the programs and operations of the IRS. Treasury Order 115- 01 also gives TIGTA the authority to enforce criminal provisions of the internal revenue laws and other criminal provisions of law relating to internal revenue for the

enforcement of which the Secretary is responsible. Under these authorities, TIGTA has the authority to investigate allegations of unlawful disclosure or inspection of return information.

See TIGTA Operations Manual, 400-290.2.

4. As part of my duties as a Special Agent in Charge, I was assigned to supervise the investigation of the alleged unauthorized disclosure of return information to ProPublica.

5. TIGTA OI conducted the investigation of the unlawful disclosure to ProPublica and determined that Charles Littlejohn was the source of such disclosure. After referral by TIGTA, the Department of Justice, Criminal Division, Public Integrity Section (PIN) filed an Information. While TIGTA coordinated with PIN during the investigation and after referral, TIGTA independently determined the course of its investigation. TIGTA, however, shared its investigative findings with PIN that supported TIGTA's determination that an unlawful disclosure occurred.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2024.

ERIK WOOD
Special Agent in Charge
Treasury Inspector General for Tax Administration